

# Exhibit 15

## Layne Hilton

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**From:** Layne Hilton  
**Sent:** Thursday, October 24, 2019 2:32 PM  
**To:** 'Clem C. Trischler'; 'Jason M. Reefer'  
**Cc:** Valsartan PEC (valpec@kirtlandpackard.com); 'Priselac, Jessica'; 'CohenL@gtlaw.com'; 'harkinss@gtlaw.com'; 'Jason M. Reefer'; 'Jessica Heinz, Esquire'; 'Blanton, Robert E.'; 'JPoletto@hkmpp.com'; 'alexia.brancato@kirkland.com'; 'lockardv@gtlaw.com'; 'rubensteinb@gtlaw.com'; 'Klein, Alan'; 'Schwartz, Barbara'; 'Waleko, Alexandra'; 'Rapone, Donna M.'; 'Goldberg, Seth A. (SAGoldberg@duanemorris.com)'  
**Subject:** RE: In re Valsartan - Mylan Custodians

Clem, Jason:

I write further to the Parties' meet and confers of October 10, and October 16, to memorialize the open issues regarding the selection of custodians.

**Historic organizational charts of API Manufacturing facilities.** As of our meet and confer on October 16, 2019, Mylan was still investigating the existence of the historical organizational charts described below in my email of October 10<sup>th</sup>. Plaintiffs believe historical organizational charts are a critical piece to developing a final custodian list, as custodians with a long tenure at the company may help to streamline custodial production and reduce duplication.

**Procurement.** Upon further review of the agreed-upon custodian list, Plaintiffs realized there are no individuals listed with responsibility for procurement of raw materials (including solvents), or individuals who had responsibility for selecting and managing the contracts for any for any third-party vendors used for solvent recovery. Plaintiffs had previously identified persons who were listed on certificates of analysis regarding certain solvents, but it appears that these individuals are not the same persons responsible for procuring and/or securing contracts for Solvents. Plaintiffs request that Mylan investigate the procurement department for API manufacturing to assist Plaintiffs in identifying relevant potential custodians.

**Finished Dose Manufacturing.** Plaintiffs recognize that Mylan contests the relevance of finished dose manufacturing facilities, and this issue will likely be decided by the Court in December. However, to the extent the Court allows for that discovery, it seems inefficient to only then begin the process of negotiating these additional custodians. As such, Plaintiffs request that Mylan produce some small subsection of documents (either organizational charts, or Establishment Inspection Reports, or both) for the Nashik and Morgantown, WV finished dose manufacturing facilities. Given that both of these facilities were both inspected numerous times, I would expect Mylan has the organizational information provided to the FDA. A small and limited organizational chart and/or EIR production for the two finished dose manufacturing facilities will allow the Parties to agree upon these custodians now and ensure that there are no additional delays in December when the Court clarifies the contours of discovery.

**Distribution, Sales, and Pricing custodians of Finished Dose Products.** Mylan has indicated that it would continue investigating other possible custodians who would have responsibility for these functions as it related to the sales and distribution of finished dose products beyond Dave Workman, who has been previously agreed upon in the below list.

**API Sales.** Mylan has indicated they would continuing gathering names for persons with knowledge of API sales of Valsartan. As of right now, the agreed-upon custodian list below does not include any API sales custodians. Through their research, Plaintiffs have identified the following people as possibly having API sales knowledge: Ruturaj Kulkarni, Satish Mahanti, Mamtha Kaushal, and Gaurav Singh. I believe Kulkarni may have been mentioned at some point by Mylan as being a person who might have relevant knowledge.

**Databases and Documents.** Mylan indicated that it was working to gather information about how electronic documents are kept in both its United States, and India operations.

When can Mylan meet and confer on the above-listed issues?

Best,

Layne

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**From:** Layne Hilton

**Sent:** Thursday, October 10, 2019 12:38 PM

**To:** 'Clem C. Trischler' <CCT@Pietragallo.com>; Jason M. Reefer <JMR@Pietragallo.com>

**Cc:** Conlee Whiteley <c.whiteley@kanner-law.com>; 'Adam Slater' <ASlater@mazieslater.com>; 'Honik, Ruben' <RHonik@GolombHonik.Com>; 'Daniel Nigh' <dnigh@levinlaw.com>; 'Stanoch, David' <DStanoch@GolombHonik.Com>; 'Christopher Geddis' <CGeddis@mazieslater.com>; 'Behram V. Parekh' <bvp@kirtlandpackard.com>; 'George T. Williamson' <gwilliamson@farr.com>; 'Marlene Goldenberg (mjgoldenberglaw.com)' <mjgoldenberglaw.com>; 'Priselac, Jessica' <JPriselac@duanemorris.com>; 'CohenL@gtlaw.com' <CohenL@gtlaw.com>; 'harkinss@gtlaw.com' <harkinss@gtlaw.com>; Jason M. Reefer <JMR@Pietragallo.com>; Jessica Heinz, Esquire <jheinz@c-wlaw.com>; 'Blanton, Robert E.' <RBlanton@hkmpp.com>; 'JPoletto@hkmpp.com' <JPoletto@hkmpp.com>; 'alexia.brancato@kirkland.com' <alexia.brancato@kirkland.com>; 'lockardv@gtlaw.com' <lockardv@gtlaw.com>; 'rubensteinb@gtlaw.com' <rubensteinb@gtlaw.com>; 'Klein, Alan' <AKlein@duanemorris.com>; 'Schwartz, Barbara' <BASchwartz@duanemorris.com>; 'Waleko, Alexandra' <AWaleko@duanemorris.com>; 'Rapone, Donna M.' <Rapone@duanemorris.com>; Goldberg, Seth A. (SAGoldberg@duanemorris.com) <SAGoldberg@duanemorris.com>; Priselac@duanemorris.com

**Subject:** RE: In re Valsartan - Mylan Custodians

Clem:

Thank you for your preparation for today's meet and confer, and the inquiries you made into the persons identified in Plaintiffs' October 8, 2019, correspondence. We will take your comments under advisement going forward and in conjunction with our continuing negotiations regarding ESI custodians.

Plaintiffs also appreciate Mylan's prompt production of an organizational chart for an API manufacturing facility, which you believe is current as of 2019. As I mentioned on our call, there are references to other organizational charts in several EIRs from over the last decade as having been provided to FDA investigators prior to inspection. Some of these documents may be duplicative of the two page document you produced today (MYLAN-MDL2875-00030973-74). However, in the event it is not, I thought the below references may assist you in locating the other historic organizational charts. These historic organizational charts will assist Plaintiffs in understanding how the leadership structure and/or divisions may have changed over time at Mylan's two API manufacturing facilities.

- October 27, 2010 Establishment Inspection Report of Matrix Laboratories (Unit III)
  - "Organizational charts detailing people from Corporate down to working level were provided (Exh. 1pg. 1-4)." See MYLAN-MDL2875-00030165-95.
- July 30, 2012 Establishment Inspection Report of Mylan Laboratories Limited (Unit 8)
  - "Organization charts were provided (Exhibit 1 pgs, 10, 17, 18). See MYLAN-MDL2875-00030258-86
- August 6, 2017 Establishment Inspection Report of Mylan Laboratories Limited (Unit 8)
  - "A copy of the firm's corporate and site-level organizational chart is included...[in] Exhibit 1." See MYLAN-MDL2875-00030226-43.
- May 21, 2018 Establishment Inspection Report of Mylan Laboratories Limited (Unit III)

- "Organizational chart provided by the firm in the Overview Presentation (Exhibit 05) which identified P. Jayachandra Prasad, Vice President – Manufacturing Operations, as the most responsible person at the firm in the absence of Mr. Jyothi Basu." See MYLAN-MDL2875-00030326-41.

Plaintiffs look forward to the follow-up information you will be providing.

Best,

Layne

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**From:** Clem C. Trischler [<mailto:CCT@Pietragallo.com>]

**Sent:** Thursday, October 10, 2019 10:51 AM

**To:** Layne Hilton; Jason M. Reefer

**Cc:** Conlee Whiteley; 'Adam Slater'; 'Honik, Ruben'; 'Daniel Nigh'; 'Stanoch, David'; 'Christopher Geddis'; 'Behram V. Parekh'; 'George T. Williamson'; 'Marlene Goldenberg ([mjgoldenberg@goldenberglaw.com](mailto:mjgoldenberg@goldenberglaw.com))'; 'Priselac, Jessica'; 'CohenL@gtlaw.com'; 'harkinss@gtlaw.com'; Jason M. Reefer; Jessica Heinz, Esquire; 'Blanton, Robert E.'; 'JPoletto@hkmpp.com'; 'alexia.brancato@kirkland.com'; 'lockardv@gtlaw.com'; 'rubensteinb@gtlaw.com'; 'Klein, Alan'; 'Schwartz, Barbara'; 'Waleko, Alexandra'; 'Rapone, Donna M.'; Goldberg, Seth A. ([SAGoldberg@duanemorris.com](mailto:SAGoldberg@duanemorris.com)); [Priselac@duanemorris.com](mailto:Priselac@duanemorris.com)

**Subject:** RE: In re Valsartan - Mylan Custodians

Layne

Following up on our call and to make sure we are on the same page, Mylan has agreed to 15 custodians for purposes of ESI discovery. The list of 15 are:

1. Imtiyaz Basade.
2. Wayne Talton
3. Cassandra Bird
4. Antony Gomas
5. Reem Malki
6. Walter Owens
7. Yasir Rawjee
8. K. Sarat Kumar
9. G. Chinni Krishna Reddy
10. Lance Molnar
11. Jeffrey Smith
12. Naveenkumar Kolla
13. Abbineni Jyothibas
14. Dave Workman
15. Michael Plastina

We exchanged a great deal of information during our call today and I indicated that I would follow up with you on a few additional names, Abhijit Deshmukh and N. Anjani Kumar. I will also follow up on your inquiries regarding the marketing, sale and distribution of valsartan API to non Mylan customers. Separately, I will reach out to Behram to discuss document management and document system inquiries.

I hope we can continue to move forward in a positive manner to finalize the identification of ESI custodians. In that regard, if you have additional names that you feel should be included on the list of 15, please pass them along and we can discuss further.

**Clem C. Trischler, Esquire**

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**From:** Clem C. Trischler

**Sent:** Wednesday, October 9, 2019 4:24 PM

**To:** Layne Hilton <[l.hilton@kanner-law.com](mailto:l.hilton@kanner-law.com)>; Jason M. Reefer <[JMR@Pietragallo.com](mailto:JMR@Pietragallo.com)>

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**Subject:** RE: In re Valsartan - Mylan Custodians

Thanks Layne. I circulated a call in for our call tomorrow morning at 10 est. In the meantime, I will review your list and be prepared to discuss it tomorrow.

**Clem C. Trischler, Esquire**

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**From:** Layne Hilton <[l.hilton@kanner-law.com](mailto:l.hilton@kanner-law.com)>

**Sent:** Tuesday, October 8, 2019 8:44 PM

**To:** Clem C. Trischler <[CCT@Pietragallo.com](mailto:CCT@Pietragallo.com)>; Jason M. Reefer <[JMR@Pietragallo.com](mailto:JMR@Pietragallo.com)>

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**Subject:** In re Valsartan - Mylan Custodians

Clem and Jason:

I write further to the parties' meet and confer on October 7, 2019.

At your request, I am providing you with a preliminary list of employees at Mylan Laboratories Limited, Mylan Pharmaceuticals, Inc., and/or Mylan N.V. (hereafter "Mylan"), who Plaintiffs have identified as being potential custodians, but who were not identified in Mylan's September 23, 2019, custodian list.

To help you in identifying these persons who work for your client(s), I have included what I believe to be their first and last name, and their job title/department, if known. I have also included, at your request, sample and demonstrative bates ranges in Mylan's core discovery production from which Plaintiffs gathered the information regarding these individuals.

Plaintiffs provide this information simply for the purposes of further conferring with Mylan regarding additional sources of custodial documents. Indeed, this list is by no means exhaustive, encompassing or definitive. This list simply represents persons known to Plaintiffs at this moment in time, as a result of an initial review of Mylan's limited core discovery production. Given the limited focus of core discovery, it is without question that this list will grow to include (among many other things): custodians related to the economic loss claims (which were not included in Mylan's initial list), custodians related to the sales and business development of API (which were not included in Mylan's initial list) and custodians related to finished dose manufacturing in both India and Morgantown, W.V. (which were not included in Mylan's initial list).

As such, Plaintiffs provide the attached information subject to, and without waiving their rights, including their right to supplement any requests as more information becomes known.

Best,

Layne

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